

Law Offices of
Susan K. Marcus
29 Broadway, Suite 1412, New York, NY 10006
T: 212-792-5131 ♦ F: 888-291-2078 ♦ E: susan@skmarcuslaw.com

July 12, 2019

The Honorable Jesse M. Furman¹
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Lisa Bershan, Barry Schwartz*, 17 Cr. 638 (JMF)

Dear Judge Furman,

Christopher Madiou and I write on behalf of Lisa Bershan and Barry Schwartz to respectfully request a slight schedule change to their previously requested bail modification. The Court granted their request on June 21, 2019 to travel to from July 15th to August 4th, 2019 [Doc 161]. Counsel for Ms. Bershan requires Ms. Bershan to be in New York on July 16, 2019. Therefore, Ms. Bershan and Mr. Schwartz request a slight modification of the schedule: they request permission to travel from July 17, 2019 through August 7, 2019.

Counsel has provided the Government and Pretrial with a proposed flight itinerary, the addresses where Ms. Bershan and Mr. Schwartz will be staying, and the names of the people they will be visiting and staying with. We have discussed this travel request with the Government and Pretrial in detail and they have no objection to our revised application.

Thank you for your consideration of this request.

Sincerely,

/s/ Susan K. Marcus, Esq.
Counsel for Barry Schwartz

/s/ Christopher Madiou
Counsel for Lisa Bershan

cc: AUSAs Negar Tekeei and Christine Magdo (via ECF)
Pretrial Officer Joshua Rothman (via email)

¹ On July 11, 2019 an ECF notice was sent saying that Joel Margulies' case was transferred to Judge Rakoff. It appears from the docket that just Mr. Margulies' case was transferred; therefore this motion relating to Mr. Schwartz and Ms. Bershan has been addressed to Judge Furman.